

The following comments were submitted by the City of St. Louis, Air Pollution Control Program on November 10, 2005.

Comments from the City of St. Louis, Air Pollution Control Program on proposed revisions to 10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning

The following are comments on the Missouri Department of Natural Resources Air Pollution Control Program's draft proposed rule amendment.

In the Applicability section, section (1), of the proposed revision for 10 CSR 10-5.300 it states that "This rule applies to any of the following processes which use nonaqueous solvents to clean and remove soils from metal parts:". This seems to exclude the use of aqueous solvents from the requirements of this rule. If that is the intent of this revision, it seems prudent that the exemptions listed in section (1)(D)1. include an exemption for the use of aqueous solvents. Then the statement in the applicability section, section (1)(C), of the rule about the use of nonaqueous solvents would not be needed and could be removed. This would eliminate the vague language used in that statement and would specifically exempt the use of aqueous solvents from the requirements in this rule.